

Presentment Date and Time: April 29, 2010 at 10:00 a.m.

Objection Deadline: April 28, 2010 at 4:00 p.m.

Hearing Date and Time (Only if Objection Filed): May 12, 2010 at 10:00 a.m.

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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| In re | : | Chapter 11 |
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| LEHMAN BROTHERS HOLDINGS INC., et al., | : | Case No. 08-13555 (JMP) |
| | : | |
| Debtors. | : | (Jointly Administered) |
| | : | |
| -----X | : | |
| In re | : | |
| | : | |
| LEHMAN BROTHERS INC. | : | Case No. 08-01420 (JMP) SIPA |
| | : | |
| Debtor. | : | |
| | : | |
| -----X | : | |

**NOTICE OF PRESENTMENT OF STIPULATION AND AGREED ORDER
WITH RESPECT TO PRESERVATION OF CERTAIN RECORDS
RELATING TO THE INVESTMENT MANAGEMENT DIVISION**

PLEASE TAKE NOTICE that the attached Stipulation and Agreed Order between the Debtors, James W. Giddens as Trustee for SIPA Liquidation of Lehman Brothers Inc., Barclays Capital Inc., and Neuberger Berman Group LLC (the "Stipulation") will be presented to the Honorable James M. Peck, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court") for approval and signature on **Thursday, April 29, 2010 at 12:00 p.m. (ET).**

PLEASE TAKE FURTHER NOTICE that, objections, if any, to the relief requested in the Stipulation must comply with the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and the Local Rules of the United States Bankruptcy Court for the Southern District of New York, must be set forth in a writing describing the basis therefor and must be filed with the Bankruptcy Court electronically in accordance with General Orders M-182 and M-193 by registered users of the Bankruptcy Court’s electronic case filing system (the User’s Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website of the Bankruptcy Court) and, by all other parties in interest, on a 3½ inch disk, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format (with a hard copy delivered directly to Chambers (as defined below)) and served in accordance with General Order M-182 or by first-class mail upon each of the following: (i) the chambers of the Honorable James M. Peck (“Chambers”), One Bowling Green, New York, New York 10004, Courtroom 601; (ii) Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Richard P. Krasnow, Esq., Lori R. Fife, Esq., Shai Y. Waisman, Esq., and Sunny Singh, Esq.), attorneys for the Debtors; (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Andy Velez-Rivera, Paul Schwartzberg, Brian Masumoto, Linda Riffkin, and Tracy Hope Davis); (iv) Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005, (Attn: Dennis F. Dunne, Esq., Dennis O’Donnell, Esq., and Evan Fleck, Esq.), attorneys for the Official Committee of Unsecured Creditors; (v) Hughes Hubbard & Reed LLP, One Battery Park Plaza, New York, NY 10004 (Attn: James B. Kobak, Esq. and Jeffrey S. Margolin, Esq.), attorneys for James W. Giddens, Trustee for SIPA Liquidation of Lehman Brothers Inc.; (vi) Proskauer Rose LLP, 1585

Broadway, New York, NY 10036 (Attn: Jeffrey W. Levitan, Esq.), attorneys for Neuberger Berman Group LLC; and (vii) Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, NY 10006, (Attn: Lindsee P. Granfield, Esq. and Lisa Schweitzer, Esq.), so as to be received no later than **4:00 p.m. (ET) on Wednesday, April 28, 2010.**

PLEASE TAKE FURTHER NOTICE that if no objections to the Stipulation are timely filed, served and received in accordance with this notice, the Bankruptcy Court may enter an order approving the Stipulation without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed and served, a hearing will be held on **Wednesday, May 12, 2010, at 10:00 a.m. (ET)** at the United States Bankruptcy Court for the Southern District of New York, Honorable James M. Peck, United States Bankruptcy Judge, One Bowling Green, New York, New York 10004-1408, 6th Floor. The moving and objecting parties are required to attend the hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: New York, New York
April 22, 2010

CLEARY GOTTLLIEB STEEN & HAMILTON LLP

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